



## South Coast Air Quality Management District

### Engineering & Compliance

*Policies &  
Procedures*

---

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT**  
**Stationary Source Compliance**  
**Local, Commercial and Community Health**  
**Small Coating, Printing, and Chemical Operations Team**

**Memorandum**

**DATE:** September 12, 1997  
**TO:** Small Coating, Printing, and Chemical Operations Team  
**FROM:** Fred Lettice /s/ FL  
**SUBJECT:** Class I Applications for Change of Locations and Modifications

In order to eliminate potential problems associated with issuing a permit to construct/permit to operate for Class I applications submitted for change of locations and modifications, please issue only a permit to construct followed by a separate permit to operate for these situations. For change of location applications, please make sure the old permit to operate is inactivated at the time you issue the new permit to operate for the new location. This should help eliminate the following problems.

1. Leaving the old permit to operate active after the equipment is relocated. The old permit to operate cannot be inactivated at the time the permit to construct is issued because the old permit has to remain in effect until the relocation occurs.
2. Billing the applicant for an annual permit to operate for both the old location and the new location. This can also occur with just a permit to construct unless the old permit to operate is inactivated as soon as construction is completed and we are notified, as required by Rule 202(a), by the applicant.
3. Having the applicant or someone else try to claim emissions or the relocation of a "phantom" piece of equipment because they paid annual permit fees for the piece of equipment at its old location after it was relocated.

For modification applications, please make sure the old permit to operate is inactivated at the time the new permit to operate is issued after the modifications are completed. This should help eliminate the following problems.

1. Leaving the old permit to operate active after the equipment has been modified. The old permit to operate cannot be inactivated at the time the permit to construct is issued because the old permit has to remain in effect until the modification occurs.
2. Billing the applicant for an annual permit to operate based on both the old permit to operate and the new permit to operate. This can also occur with just a permit to construct unless the

old permit to operate is inactivated as soon as the modification is completed and we are notified, as required by Rule 202(b), by the applicant.

3. Having the applicant or someone else try to claim emissions or the relocation of a "phantom" piece of equipment because they paid annual permit fees for the piece of equipment based on its pre-modification permit after it was modified.

I appreciate that these directions will create some additional work in the form of processing both a permit to construct and a permit to operate instead of just a permit to construct/permit to operate. However, with the potential problems it will eliminate, I believe our work will be more accurate and we will come out ahead in the long run.

I appreciate your help in these matters. If you have any questions pertaining to these instructions, please see me.

FEL

cc: Jack Broadbent  
LCCH Managers  
Alene Taber